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REF: Public Access to Peer-Reviewed Scholarly Publications Resulting from Federally Funded Research

Submit to: publicaccess@ostp.gov

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On behalf of the American Association for the Advancement of Science (AAAS), we are submitting a response to the Request for Information (RFI) on Public Access to Peer-Reviewed Scholarly Publications. Improving access to scientific and technical information is a longstanding commitment of AAAS and its journals, such as *Science*, one tied closely to our mission of advancing science and innovation throughout the world for the benefit of all people.

AAAS believes it is important that the discussion surrounding public access must clearly distinguish between access to research results in support of scientific progress and access to scientific information as a crucial element of public engagement to enhance the understanding of science and/or to inform public policy. The primary target audience for the technical research papers published in the scientific literature is the research community that utilizes the information to replicate, reproduce and expand on that knowledge base.

Question 1-Areas of Economic Growth. Given the advent of immediate access to digital information that we are witnessing in many sectors of the global market, one area of potential economic growth is the establishment of data aggregators created in the private sector that build upon existing federal depositories (e.g., DNA Sequencing, Climate data). Such aggregation of data could offer scientists powerful resources to support and expand their research. However, while this may be viewed as an area of new growth, it could result in a decline in usage of traditional non-aggregated sources such as non-profit, scholarly publications.

Question 2-Intellectual Property. One mechanism that federal agencies should use to protect the interests of publishers, scientists, and federal agencies is to allow researchers to post only a copy of the "accepted version" of a research article. This can serve to highlight the added value and content that journals bring to articles. AAAS journals allow authors who are required by their funding agency to make their research publicly available to post in the repository the accepted version of a paper six months after publication, provided the posting is linked back to the original published version and includes the published paper's full reference citation. The accepted version is the version of the paper accepted for publication after changes resulting from peer review, but before AAAS's editing, image quality control, and production. Errors are corrected in final, copy-edited versions of manuscripts, and additional corrections to some research articles may arise several months after publication. Our journal *Science* currently takes responsibility for clearly linking supplementary materials, corrections, retractions, letters and technical comments to the original paper posted on www.sciencemag.org. The version of record on our site may also have links to news analysis and commentary articles that provide the reader with context for understanding the research.

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Question 3-Centralized versus Decentralized. In this question, OSTP asks if there are reasons why a federal agency "should maintain custody of all published content" in addition to asking the pros and cons of supporting a centralized and decentralized approach to public access. AAAS believes that the term "custody" may carry several meanings and it is not clear in the RFI how the term is being used. Giving "custody of all published content" to the federal government raises serious questions about public access in its own right, and would require very clear ground rules for delineating the government's authority to "control" publication access if this concept were to be adopted. All effort should be made to discourage any real or perceived abuse of authority over control of content. AAAS favors a more distributive approach.

Question 5-Interoperability and Core Metadata. AAAS recommends that OSTP carefully consider the importance of establishing taxonomy standards that are uniform and that will allow for changes across the many vendors and platforms that currently exist as well as those that may emerge in the future. Establishing taxonomy standards will greatly enhance the capacity to facilitate interoperability between disciplines, as well as support the development of semantic Web sites that could be utilized by researchers and scholarly publishers.

In regards to setting accessibility for minimum core metadata, OSTP should consider the policies established by the journal *Science*. An overarching goal, for example, should be to ensure that "all data necessary to understand, assess, and extend the conclusions of the manuscript" be made available. Furthermore, all reasonable requests for data and materials by scientific researchers must be fulfilled. At the same time, any federal policy must recognize that some limitations and restrictions may exist, for example, data obtained from other sources and restricted by Material Transfer Agreements. Any public access policy must require that authors disclose all such restrictions and limitations.

Question 6-Maximizing Benefit of Public Access. Federal agencies must understand that any movement toward public access policies is essentially an experiment. Imposing new burdens and costs on stakeholders will be difficult to avoid, as the scholarly publishing community comprises a range of business models. It is important that the federal government continue to engage stakeholders with a range of perspectives (e.g., for-profit, non-profit) and to create avenues for stakeholders to work in tandem with relevant agencies as public access policies are considered. Efforts such as the Roundtable on Scholarly Publishing project launched by the House Science and Technology Committee in 2010 are good examples.

We thank OSTP for the opportunity to express our views. If you have any questions regarding these comments, please do not hesitate to contact me at 202/326-6639 or aleshner@aaas.org.

Sincerely,

Alan I. Leshner